

From: [Sims, Douglas C SWF](#)
To: [Coltrain, Katrina](#)
Cc: [Sease, Rebekah SWF](#)
Subject: Wilcox Superfund Site, Bristow, OK
Date: Monday, March 28, 2016 4:41:48 PM

RE: Wilcox Superfund Site, Bristow, OK

Katrina:

Per our meeting and discussion Wednesday, 23 March 2016, with the Oklahoma Archaeological Survey (OAS) and State Historic Preservation Office (SHPO), the following is the proposed path forward for the Section 106 compliance at the Wilcox Superfund Site, Bristow, Oklahoma:

The land and surrounding terrain associated with the Wilcox Superfund Site has undergone significant alteration and other ground disturbing/contaminating activities over the last century. Land altering activities also continue today as noted most recently (ca. 2004) by one landowner clearing and grubbing along a creek on the eastern extent of the site originally thought to contain undisturbed/forested lands. Due to these disturbances, the possibility for the Wilcox site possessing significant, intact subsurface cultural resources is very low.

Furthermore, because of the presence (or high likelihood) of significant soil contamination associated with the crude oil refinery operations at Wilcox, subsurface cultural resources investigations, such as shovel tests, backhoe trenching or other ground disturbing activities, should not be conducted due to the high probability of ingesting contaminants. There is simply no reason to expose archeologists to contaminants, especially when there is such a low possibility of discovering anything cultural significant.

Finally, during the 23 March site visit, it was noted that ground surface exposure was minimal (>20% visibility) and therefore a surface inspection would not be of any value in locating or identifying additional cultural resources above and beyond what has already been documented in the standing structures survey and inventory.

Therefore, EPA, USACE, OAS and SHPO agreed the most appropriate path forward would be to conduct a thorough background research and develop an extensive historical context (i.e., comprehensive history) for the Wilcox Superfund site. Property ownership records, oral histories, Muscogee (Creek) information (road locations, etc.), would be just a few items that this history might include. No additional fieldwork (survey, subsurface investigations, etc.), other than perhaps another site visit, would be required at this time. The background research and historic context document would not only cover the period from which the Wilcox and Lorraine Refineries operated (EPA has most of this information already), but also include discussions on prehistoric and other time periods prior to the operations of these refineries, so that a discussion on land use and change, disturbances/impacts, as well as other activities could be had to help better define what has occurred in this area. This context document might also help guide/inform future EPA testing and remediation activities at the site.

Also per SHPO request, we should hold Joseph's standing structure survey for incorporation into this historic context document and not submit 2 separate items for their review and comment.

If you are in concurrence with this path forward, background research/context document, I will draft a letter for you to send to OAS and SHPO re-confirming the approach. Just let me know. Also, if you would like us to help with the background research and historical context document, we will require additional funding for the preparation and award of a contractual task order (this cannot be done with in-house resources) that we can talk about at your convenience.

Thanks

Doug

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